

BEFORE THE
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department)
of Telecommunications and Energy on its)
own motion, pursuant to G.L. c. 159, §§ 12)
and 16, into the collocation security policies) D.T.E. 02-8
of Verizon New England, Inc. d/b/a)
Verizon Massachusetts)
_____)

PETITION FOR LEAVE TO INTERVENE OF
CONVERSENT COMMUNICATIONS OF MASSACHUSETTS, LLC

Pursuant to 220 CMR § 1.03 of the regulations of the Massachusetts Department of Telecommunications and Energy (“Department”), Conversent Communications of Massachusetts, LLC (“Conversent ”) respectfully submits this Petition for Leave to Intervene (“Petition”) in the above-captioned proceeding. In support of this Petition, Conversent states the following:

1. Conversent is a telecommunications carrier authorized by the Department to provide intrastate services in the Commonwealth in competition with Verizon Massachusetts (“Verizon MA”).
2. The Department, on its own motion, has opened an investigation into collocation security in Massachusetts. This investigation could impact the terms and conditions under which Conversent leases collocation facilities from Verizon MA.
3. As a competitive telecommunications provider and purchaser of Verizon MA’s collocation services, Conversent has a direct and substantial interest in the outcome of this proceeding.
4. Conversent’s interest in this matter cannot be adequately addressed or represented by any other party. Consequently, Conversent’s participation in this proceeding will help ensure the development of a comprehensive record, while affording Conversent the opportunity to protect its interests.

5. The extent of Conversent's participation in this docket will depend upon the scope of the proceeding as determined by the Department and the parties to this proceeding. Depending upon the schedule and specific issues in this proceeding, Conversent may file comments and/or testimony, as well as discovery responses, briefs, reply briefs and other pleadings in this investigation.

6. All correspondence and other documents with respect to this matter should be directed to the following:

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7. Conversent requests the Department to grant Conversent's Petition.

Respectfully submitted,

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